

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

VIDEO GAMING TECHNOLOGIES, INC.,

Plaintiff,

v.

CASTLE HILL STUDIOS LLC, *et al.*

Defendants.

CASE NO. 17-CV-00454-GKF-JFJ

DEFENDANTS' PRETRIAL DISCLOSURES

Defendants Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC (collectively, "Castle Hill"), hereby submit the following pretrial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(3):

I. Trial Witnesses

A. Witnesses Castle Hill Expects to Call:

1. Dan Fulton (Castle Hill employee)
2. Alan Roireau (Castle Hill employee)
3. Jason Sprinkle (Castle Hill employee)
4. Arthur Watson (Castle Hill employee)
5. Robert Zeidman (Castle Hill expert)
6. Todd Schoettelkotte (Castle Hill expert)
7. James Starr (VGT employee)
8. Jay Sevigny (VGT employee)
9. Ryan North (VGT employee)

B. Witnesses Castle Hill May Call:

1. Andrew Scheiner (Castle Hill employee)
2. Paul Suggs (Castle Hill employee)

3. Joseph Valandra (Castle Hill expert)
4. John Taylor (former Castle Hill employee)
5. George Weilacher (Castle Hill employee)
6. Rich Sisson (Castle Hill employee)
7. Seth Morgan (Castle Hill employee)
8. Brandon Booker (Castle Hill employee)
9. Josh Larson (Castle Hill employee)
10. Aaron Milligan (Castle Hill employee)
11. James Berger (Castle Hill expert)
12. Zachary Schmid (former VGT employee)
13. David Marsh (VGT employee)
14. Will Harvie (VGT employee)
15. Craig Eubanks (VGT employee)
16. David Gess (Castle Hill employee)
17. Sarah Carlson (former VGT employee)

II. Designation of Witnesses Castle Hill Expects to Present by Deposition

Castle Hill previously filed its deposition designations (Dkt. 343) and counter-designations (Dkt. 347) with the Court, and submitted hard copies of annotated deposition transcripts to the Clerk. Castle Hill may present the deposition testimony of the following witnesses by deposition:

1. Sarah Carlson
2. Joshua Davis (August 3, 2018)
3. Craig Eubanks
4. Larry Graham
5. Will Harvie

6. Don Kovach
7. David Marsh
8. Butch McGill
9. Ryan North
10. Karl Roelofs
11. Zachary Schmid
12. Jay Sevigny
13. Barry Smitherman
14. James Starr
15. John Taylor
16. Zachary Trover
17. John Yarbrough

To the extent VGT presents deposition testimony of any witness, Castle Hill reserves the right to present its counter-designations.

III. Identification of Exhibits

The documents and exhibits that Castle Hill expects to offer and may offer if the need arises are attached hereto as **Exhibit A**. Castle Hill reserves the right to modify or supplement this list, to introduce additional exhibits as the need to do so may arise, including but not limited to for impeachment or rebuttal purposes, and to use any exhibit identified by Plaintiff.

Dated: August 19, 2019

Respectfully submitted,

/s/ Robert C. Gill

Robert C. Gill (admitted *pro hac vice*)

Henry A. Platt (admitted *pro hac vice*)

Matthew J. Antonelli (admitted *pro hac vice*)

Jeremy B. Darling (admitted *pro hac vice*)

SAUL EWING ARNSTEIN & LEHR, LLP

1919 Pennsylvania Avenue, NW, Suite 550

Washington, D.C. 20006
(202) 295-6605
robert.gill@saul.com
henry.platt@saul.com
matt.antonelli@saul.com
jeremy.darling@saul.com

James C. Hodges, OBA #4254
JAMES C. HODGES, P.C.
2622 East 21st Street, Suite 4
Tulsa, Oklahoma 74114
(918) 779-7078
JHodges@HodgesLC.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of August, 2019, I caused a copy of the foregoing **DEFENDANTS' PRETRIAL DISCLOSURES** to be filed using the Court's electronic filing system, which will send electronic notice to the following counsel for Plaintiff:

Graydon Dean Luthey, Jr.
GABLE GOTWALS
1100 ONEOK Plaza
100 West Fifth Street
Tulsa, OK 74103-4217
(918) 595-4821
(918) 595-4990 (facsimile)
dluthey@gablelaw.com
Counsel for Plaintiff

Neil K. Roman
COVINGTON & BURLING LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018-1405
(212) 841-1221
(212) 841-1010 (facsimile)
nroman@cov.com
Counsel for Plaintiff

Gary M. Rubman
Peter Swanson
Rebecca B. Dalton
COVINGTON & BURLING LLP
One City Center
850 Tenth Street, NW
Washington, DC 20001-4956
(202) 662-6000
(202) 778-5465 (facsimile)
grubman@cov.com
pswanson@cov.com
rdalton@cov.com
Counsel for Plaintiff

/s/ Robert C. Gill

Robert C. Gill